

1 THOMAS G. GILMORE, ESQ.  
State Bar No. 91984  
2 LAW OFFICES OF THOMAS G. GILMORE  
3232 FOURTH AVENUE  
3 SAN DIEGO, CALIFORNIA 92103  
(619) 426-4444  
4

5 Attorney for Material Witnesses  
6  
7

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 (Honorable Leo S. Papas)

11 UNITED STATES OF AMERICA,	)	CASE NO. 08MJ0843
	)	
12 Plaintiff,	)	
	)	DECLARATION OF THOMAS G. GILMORE
13 vs.	)	IN SUPPORT OF MOTION FOR
	)	VIDEOTAPE DEPOSITION AND
14 MARTIN ORTIZ-CASTANEDA,	)	SUBSEQUENT VOLUNTARY DEPORTATION
	)	OF MATERIAL WITNESSES
	)	
	)	DATE: April 15, 2008
16 Defendant.	)	TIME: 9:30 a.m.
	)	PLACE: Courtroom of Magistrate
	)	Leo S. Papas

17

18 I, Thomas G. Gilmore declare:

19 I am an attorney duly licensed to practice before all the  
20 courts of this State, District and Circuit, and am the attorney of  
21 record for the material witnesses in the above action, ADOLFO  
22 GALVEZ-DE JESUS, ALBERTANO PANTALEON-NAJERA, FRANCISCO RAMIREZ-  
23 VELASQUEZ and ANTONIO GALVEZ-DE JESUS.

24 I have personal knowledge of the facts set forth in this action  
25 and could testify competently thereto if called.

26 My clients in this action have been in federal custody since  
27 March 15, 2008 because they cannot locate anyone to post bond for  
28 them.

1 My clients entered the United States to find work to support  
2 family members at home in their country of origin. Each day they  
3 remain in custody is an additional hardship on themselves and their  
4 families.

5 Based on the above it respectfully requested that this motion  
6 be granted, that said depositions take place at the earliest  
7 possible time, and that my clients be allowed to voluntarily return  
8 home to their country of origin immediately thereafter.

9 I declare under the penalty of perjury under the laws of the  
10 State of California that the foregoing is true and correct of my own  
11 personal knowledge except as to those matters stated to be based  
12 upon information and belief and, as to those matters, I am informed  
13 and believe that they are true and correct.

14 Executed this 2nd day of April, 2008, in San Diego, California.

15 /ss/ Thomas G. Gilmore  
16 THOMAS G. GILMORE, Attorney for  
Material Witnesses  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28